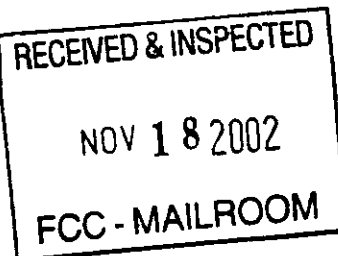


## **Attachment 22**

*William L. Zawila*  
ATTORNEY AT LAW



12550 BROOKHURST STREET  
GARDEN GROVE, CALIFORNIA 92640  
(714) 636-5040

November 10, 2002

Secretary  
FCC  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: KKFO(AM), Coalinga, CA  
Western Pacific Broadcasting, Inc.  
File Number: BR-19970804YJ  
Facility Number: 71936  
Reply Reference Number: 1800B3-TSN  
Request for Additional Time to Further Reply to Letter  
of January 25, 2002

Secretary:

This letter is submitted on behalf of Western Pacific Broadcasting, Inc., licensee of KKFO(AM), Coalinga, California. We are requesting additional time to further respond to the Commission's letter of January 25, 2002, regarding KKFO(AM).

Since our letter of October 21, 2002, we have continued to make further progress in dealing with the various matters involved in obtaining information and documents from deceased counsel for KKFO(AM) which are required to properly respond to the Commission's letter. This task has been, and continues to be, a very difficult matter as we have been presented with extremely adverse circumstances arising out of the demise of two of KKFO(AM)'s former attorneys. This matter was discussed in our letters of September 30, 2002 and October 21, 2002. While we have received some of the required information and documents, we are still engaged in ongoing efforts to obtain additional information and documents from these sources which are essential to a proper response to the Commission's letter. As part of this ongoing effort, we are still attempting to enlist the aid of former staff members who worked for KKFO(AM)'s two deceased former attorneys. Additional time is needed to further deal with the complexity of the problems presented by the demise

*William L. Zawila*  
ATTORNEY AT LAW

12550 BROOKHURST STREET  
GARDEN GROVE, CALIFORNIA 92640  
(714) 636-5040


of two of KKFO(AM)'s former attorneys. We are continuing to work on this complex matter which involves a wide range of diverse issues covering an extended period of time as presented by the Commission's letter. The age of some of the information and documentation required in this matter which dates back almost 20 years has contributed significantly to the difficulty of this matter. Further, beyond the matter of deceased counsel and the myriad problems attendant thereto as mentioned above, we are still awaiting the arrival of additional information and documents from third parties which are required to properly respond to the Commission's letter which inquires into almost 20 years of KKFO(AM)'s history.

Based on the points outlined above, we respectfully request an additional twenty (20) days through November 30, 2002, to further respond to the Commission's above-referenced letter.

Thank you for your consideration of this matter. We are submitting this letter in triplicate.

Very truly yours,

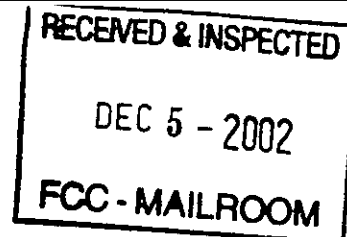
WLZ/jc



WILLIAM L. ZAWILA  
Attorney For Western  
Pacific Broadcasting,  
Inc.

## **Attachment 23**

*William L. Zawila*  
ATTORNEY AT LAW



12550 BROOKHURST STREET  
GARDEN GROVE, CALIFORNIA 92640  
(714) 636-5040

December 1, 2002

Secretary  
FCC  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: KKFO(AM), Coalinga, CA  
Western Pacific Broadcasting, Inc.  
File Number: BR-19970804YJ  
Facility Number: 71936  
Reply Reference Number: 1800B3-TSN  
Request for Additional Time to Further Reply to Letter  
of January 25, 2002

Secretary:

This letter is submitted on behalf of Western Pacific Broadcasting, Inc., licensee of KKFO(AM), Coalinga, California. We are requesting additional time to further respond to the Commission's letter of January 25, 2002, regarding KKFO(AM).

Since our letter of November 10, 2002, we have continued to make further progress in dealing with the various matters involved in obtaining information and documents from deceased counsel for KKFO(AM) which are required to properly respond to the Commission's letter. This continuing task has been, and remains, a very difficult and complicated matter as we have been presented with extremely adverse circumstances arising out of the demise of two of KKFO(AM)'s former attorneys. This matter was discussed in our letters of October 21, 2002 and November 10, 2002. Although we have received some of the required information and documents, we continue to be engaged in ongoing efforts to obtain additional information and documents from these sources which are essential to a proper response to the Commission's letter. As part of this ongoing effort, we are still attempting to enlist the aid of former staff members who worked for KKFO(AM)'s two deceased former attorneys.

*William L. Zawila*  
ATTORNEY AT LAW

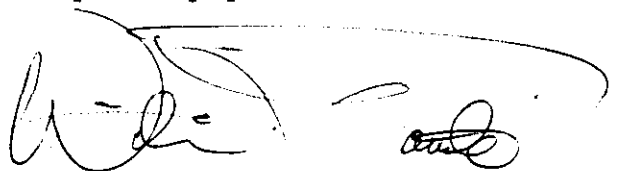
12550 BROOKHURST STREET  
GARDEN GROVE, CALIFORNIA 92640  
(714) 636-5040

This effort is starting to yield some beneficial results as we have obtained some information through this means. We anticipate obtaining additional essential information through this same effort. Additional time is needed to further deal with the complexity of the problems presented by the demise of two of KKFO(AM)'s former attorneys. We are continuing to work on this complex matter which involves a wide range of diverse issues covering an extended period of time as presented by the Commission's letter. The age of some of the information and documentation required in this matter which dates back almost 20 years has contributed significantly to the difficulty of this matter. Further, beyond the matter of deceased counsel and the myriad problems attendant thereto as mentioned above, we are still awaiting the arrival of additional information and documents from third parties which are essential to properly respond to the Commission's letter which inquires into almost 20 years of KKFO(AM)'s history.

Based on the points outlined above, we respectfully request an additional twenty (20) days through December 21, 2002, to further respond to the Commission's above-referenced letter.

Thank you for your consideration of this matter. We are submitting this letter in triplicate.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'W. L. Zawila', with a long horizontal flourish extending to the right.

WILLIAM L. ZAWILA  
Attorney For Western  
Pacific Broadcasting,  
Inc.

WLZ/jc

## **Attachment 24**

1 DALE E. BACIGALUPI  
PROFESSIONAL LAW CORPORATION  
2 Dale E. Bacigalupi #097197  
Stephen Kent Ehat #133509  
3 7112 North Fresno Street, Suite 140  
Fresno, California 93720  
4 (209) 431-6800

5 Attorneys for Plaintiff CITY OF COALINGA

6  
7  
8 CENTRAL VALLEY MUNICIPAL COURT, COALINGA DIVISION

9 CITY OF COALINGA,

10 Plaintiffs,

11 v.

12 COALINGA BROADCASTING COMPANY,  
13 INC., a California Corporation,  
dba Radio Station KKFO AM 1470,

14 Defendant.  
15

CASE NO. C95000095-0

DECLARATION OF DOROTHY  
INGHAM IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT BY  
PLAINTIFF ON PLAINTIFF'S  
COMPLAINT FOR UNLAWFUL  
DETAINER

16 I, DOROTHY INGHAM, declare:

17 1. I am competent to testify. The facts set forth herein are known to me personally and, if  
18 called to testify, I could and would testify as set forth herein. I make this declaration knowing it  
19 will be used in support of a motion for summary judgment made by plaintiff CITY OF COALINGA  
20 against defendant COALINGA BROADCASTING COMPANY, INC., a California corporation, dba  
21 Radio Station KKFO AM 1470 in that unlawful detainer action on file in the Central Valley  
22 Consolidated Municipal Court, Coalinga Division.

23 2. I am and at all times pertinent herein have been the Finance Director for the City of  
24 Coalinga.

25 3. Ever since April 1, 1995, the City has refused to accept any and all lease payments  
26 which defendant has attempted to tender, considering defendant to be nothing more than a  
27  
28



1 trespassing tenant illegally holding over on the premises.

2 I declare under penalty of perjury under the laws of the State of California that the foregoing  
3 is true and correct.

4 Executed this 18th day of August, 1995 at Coalinga, California.

5  
6 151  
7 DOROTHY INGHAM  
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## **Attachment 25**

**RECEIVED**

**JUL 03 1995**

**CITY OF COALINGA**



155 W. Duran Avenue  
Coalinga, CA 93210

Phone (209) 935-1533  
FAX (209) 935-5912

June 30, 1995

Coalinga Broadcasting Company, Inc.  
KKFO  
12550 Brookhurst Street, Suite A  
Garden Grove, CA 92640

Dear KKFO:

On June 28, 1995 the City of Coalinga received your check in amount of \$25.00 for the KKFO tower rent. I am returning your check because your lease expired February 28, 1995. If you have any questions, please contact me at (209) 935-1531.

Cordially,

A handwritten signature in cursive script that reads "Dotty Ingham".

Dotty Ingham  
Finance Director

DI/cr

Enclosure: Check #3442

cc: Russell Carlsen, Interim City Manager  
Alan Jacobsen, Public Services Director  
Dale Bacigalupi, City Attorney

EX "4"

## **Attachment 26**



City of Coalinga  
160 W. Elm  
Coalinga, CA 93210  
IRS #94-60000312  
Phone: (209) 935-1531  
Fax: (209) 935-5912

Customer #

10027

Date:

May 3, 1995

COALINGA BROADCASTING CO. INC.  
12550 BROOKHURST ST., #A  
GARDEN GROVE, CA 92640

CREDIT BALANCE OF \$20.60

Please detach and return this portion with your payment

DATE	DESCRIPTION	CHARGE	CREDIT
	PREVIOUS BALANCE	14.70	
4/10	PAYMENT		-50.00
4/30	TOWER RENT	14.70	

CURRENT	30 DAYS	60 DAYS	90 DAYS	120 DAYS	AMOUNT DUE
CREDIT BILL, DO NOT PAY					-20.60